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## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

EXPERIMENTAL CHANGES TO	)	Docket No. MC2002-2
IMPLEMENT CAPITAL ONE NSA	)	

VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
DESIGNATION OF WRITTEN AND ORAL CROSS-EXAMINATION OF
UNITED STATES POSTAL SERVICE WITNESS MICHAEL K. PLUNKETT (USPS-T-2)
(November 27, 2002)

## Written Cross-Examination

Pursuant to section 30(e)(2) of the Postal Rate Commission rules of practice, Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. hereby designate the following responses to interrogatories as their written cross-examination of United States Postal Service witness Plunkett:

APWU/USPS-T2-6

OCA/USPS-T2-1

VP/USPS-T2-1-7

Two copies of the above documents are submitted by mail to the Secretary of the Commission.

## Oral Cross-Examination

Pursuant to section 30(e)(3) of the Postal Rate Commission rules of practice, Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. hereby state their intention to orally cross-examine United States Postal Service witness Plunkett with respect to his responses to designated written cross-examination and regarding the Postal Service's

criteria for evaluating whether Negotiated Service Agreements ("NSAs") are deemed favorable for the Postal Service.

Respectfully submitted,

William J. Olson John S. Miles WILLIAM J. OLSON, P.C. 8180 Greensboro Drive, Suite 1070 McLean, Virginia 22102-3860 (703) 356-5070

Counsel for: Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

William J. Olson

November 27, 2002